

notice is not possible unless his flight is delayed. If Mr. Salazar-Martinez is not removed tomorrow, there is a significant chance of delay. The next available flight for him would be on June 18, 2020, which might not work because his travel document expires that day. He could easily face a delay of several months or more.

Undersigned counsel has insisted that there be an explanation for ERO's failure to provide him with sufficient time in which to properly notify the Court. However, in light of Mr. Salazar-Martinez having expressed his desire to be promptly removed, and assuming that no opposition is filed tomorrow morning, Defendants request that the Court waive the 48 hour notice requirement for this individual under these circumstances.

Respectfully submitted,

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June 10, 2020

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: June 10, 2020

/s/ Thomas E. Kanwit
Thomas E. Kanwit